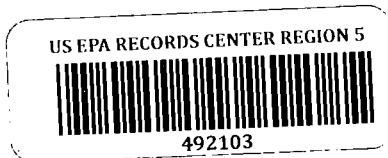




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Mr. Ross del Rosario  
USEPA Region 5 – SR-6J  
77 W. Jackson Boulevard  
Chicago, Illinois 60604-3590

March 12, 2012  
(2034)

RE: Administrative Order on Consent  
Response to USEPA Comments on Site-Specific Work Plan, Revision 1  
North Station Upland Operable Unit, North Branch Site, Chicago, Illinois  
Peoples Gas Light and Coke Company

CERCLA Docket No. V-W-08-C-917  
CERCLIS ID – ILD982074775

Dear Mr. del Rosario,

On behalf of Integrays Business Support, LLC (IBS), Natural Resource Technology, Inc. (NRT) is providing the enclosed two hard copies of replacement pages and two CD copies of the entire Site-Specific Work Plan (SSWP), Revision 1 Modified on March 12, 2012 for the Peoples Gas Light and Coke Company's (PGL) North Station Upland Operable Unit (OU) of the North Branch Site. These documents have been prepared as required in Section 1.1.2.2 of the Statement of Work (SOW) included with the Settlement Agreement and Administrative Order on Consent (Settlement Agreement) between United States Environmental Protection Agency (USEPA) and PGL effective October 31, 2008.

The enclosed modified documents have incorporated USEPA comments received on January 26, 2012 on the SSWP, Revision 1. For ease of review, historic comments are presented below in *italics*, followed by the current responses from IBS.

#### **General Comments**

**USEPA General Comment #2 - Data Tables Screening Criteria:** *The source of the Residential screening criteria is not indicated, and should be provided. As with the agreed upon approach utilized for the Waukegan North Plant SSWP, the most recent EPA RSL tables should be used for data comparison purposes. If necessary, the data should be re-screened against the RSL criteria, and the tables should be updated. Some differences in screening criteria were noted between the Waukegan North Plant SSWP (dated June 30, 2011) and this Completion report, such as the screening criteria used for ethylbenzene and naphthalene. Screening criteria should be consistent between sites. No other footnotes or legend key is shown on the Tables other than "surface" or "floor" sample designations. Footnotes, keys and legends should be used to define abbreviations, etc.*

**11/28/11 IBS FOLLOWUP RESPONSE:** *Figures 7, 28 and 31, and appendices E1 and H have been modified to include the carcinogenic Regional Screening Levels (RSL) for naphthalene and ethylbenzene. In addition, the historic data summary in Section 3.7 has been updated to include comparison to these carcinogenic RSLs and a reference to the revised SLs is included in Section 4.3.*

**1/26/12 USEPA FOLLOWUP COMMENT:** *The IBS response is acceptable with the caveat that Table D-1 also be amended to include the residential carcinogenic screening criteria and summary statistics for naphthalene. The table currently shows only the non-carcinogenic criteria.*



**3/12/12 IBS FOLLOWUP RESPONSE:** Table D-1 has been modified to include the cancer endpoint screening level for naphthalene for residential soil, 3,600 ug/kg. Summary statistics related to the screening level have also been modified. Hard copies of Tables D-1 and D-2 are attached for replacement in the document. Table D-2 has not been modified, however it was printed on the back of Table D-1 in Revision 1 of the document, so replacement of both tables is necessary.

**1/26/12 USEPA Additional Comment** - *Per our recent discussions regarding the Division Street Preliminary RI Results, the procedure for evaluating field duplicate results (i.e. data review, validation, data usability, data assessment and corrective action responses) does not appear to be specified in the Multi Site FSP document (dated 9/8/2008), or the Multi Site QAPP (dated 9/4/07). In addition, the North Station Site-Specific QAPP document (Appendix B1 of the submittal) does not contain any discussion of field duplicate evaluation either. Revisions to one or more of these documents are requested to describe the procedures that will be used for the evaluation and use of all field duplicate data. This request is made to clarify the procedures that will be followed if any future discrepancies arise that are similar to the issue that was discovered at Division Street monitoring well location MW -110.*

**3/12/12 IBS FOLLOWUP RESPONSE:** The groundwater sample duplicate issue identified in the Division Street preliminary data set has been investigated per the Multi-Site QAPP and Site-Specific QAPP. The cause of the apparent disparity between the investigative and duplicate samples originally attributed to well MW-110 was due to an error in transcription of field data to the electronic database. As field notes describe, the duplicate sample was collected at well MW-101, not well MW-110. This correction has been made in the database and tables and figures associated with Division Street.

Consistent with the response to USEPA's comment letters for Division Street and North Plant, as a further corrective action regarding the duplicate issue, IBS will perform a final QC check of all data files created by field contractors prior to uploading duplicate sample data into the database. Electronic files will be verified by comparison to field notes.

Uniform Federal Policy (UFP) QAPP Worksheet #28 is attached to describe evaluation of field duplicate results for aqueous and non-aqueous media in the IBS Multi-Site Program. The approach outlined in the worksheets is based on the Multi-Site QAPP Table 6, the *EPA Region I, EPA-NE Data Validation Functional Guidelines for Evaluating Environmental Analyses, Revised* (USEPA, December 1996), and an email from Ross del Rosario (USEPA) to Naren Prasad (IBS) on January 24, 2012, titled "Sample Duplicate Discrepancies."

The modified hard-copy documents enclosed should replace Tables D-1 and D-2 of the SSWP, Revision 1 (November 28, 2011). The modified CDs enclosed contain the entire SSWP, Revision 1, modified on March 12, 2012. Please contact Mr. Naren Prasad of IBS at 312.240.4569 if you should have any questions regarding the content of this letter.

Sincerely,

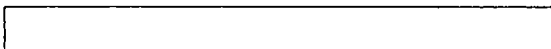
NATURAL RESOURCE TECHNOLOGY, INC.

A handwritten signature in black ink, appearing to read "Sarah Meyer".

Sarah Meyer  
Senior Scientist/Project Manager

A handwritten signature in black ink, appearing to read "Jennifer M. Kahler".

Jennifer M. Kahler, PE  
Senior Engineer

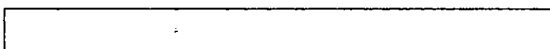


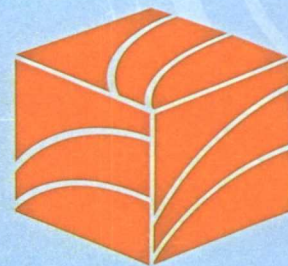
Mr. Ross del Rosario  
March 12, 2012  
Page 3



Enc: Modified Table D-1 and original Table D-2 (hard copy replacement pages for SSWP, Revision 1)  
Multi-Site QAPP Addendum, UFP QAPP Worksheet #28  
SSWP, Revision 1, Modified March 12, 2012 (on CD)

cc: Mr. D. Wilson, IEPA  
Mr. Naren Prasad, IBS  
Mr. David Klatt, CH2MHill





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**SITE SPECIFIC WORK PLAN, REVISION 1**

**North Station Former MGP  
North Branch Operable Unit, Chicago, IL  
Peoples Gas Light and Coke Company**

**Project No: 2034**

**Modified - March 12, 2012**



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**SITE-SPECIFIC WORK PLAN**

**PEOPLES GAS LIGHT AND COKE COMPANY  
NORTH STATION FORMER MGP, NORTH BRANCH OPERABLE UNIT  
CHICAGO, ILLINOIS**

**CERCLA Docket No. V-W-08-C-917  
CERCLIS ID – ILD982074775**

**Project No. 2034**

**Prepared For:**

**Integrus Business Support, LLC  
130 East Randolph Street, 22<sup>nd</sup> Floor  
Chicago, IL 60601**

**Prepared By:**

**Natural Resource Technology, Inc.  
311 S. Wacker Drive, Suite 1670  
Chicago, Illinois 60606**

**Revision 1  
Modified - March 12, 2012**

**Sarah L. Meyer**  
Project Manager

**Jennifer M. Kahler, PE**  
Senior Engineer

## **APPENDIX D**

**MODIFIED TABLES - MARCH 12, 2012**

**SITE-SPECIFIC COPC SCREEN FOR SOIL,  
GROUNDWATER, SEDIMENT AND SURFACE WATER**

**Table D-1 – Summary Statistics for Soils on the ComEd, LaSalle Chestnut, Division-Halsted and City Right-of-Way Parcels**  
**North Station Operable Unit**  
**Site-Specific Work Plan**

Analyte	Residential SL <sup>a</sup> (ug/kg)	[Min] (ug/kg)	[Max] (ug/kg)	# Sample Results Above Residential SL	Total # Samples Analyzed	# Sample Results Above MDL	% Samples Analyzed Above MDL	Min MDL (ug/kg)	Max MDL (ug/kg)
<b>VOCs</b>									
Benzene	1,100	2	730,000	67	284	109	38.38	3	100
Xylenes, Total	630,000	5	860,000	2	284	112	39.44	4	100
<b>SVOCs</b>									
2-Methylnaphthalene	310,000	85	7,670,000	9	167	72	43.11	330	2200
3,3-Dichlorobenzidine	1,100	6,000	6,000	1	131	1	0.76	700	4,000
Dibenzofuran	7,800	55	137,000	1	167	59	35.33	300	2,200
<b>PAHs</b>									
Benzo(a)anthracene	150	32	745,000	211	379	234	61.74	25	530
Benzo(a)pyrene	15	30	460,000	257	379	257	67.81	20	400
Benzo(b)fluoranthene	150	27	350,000	203	379	227	59.89	25	530
Benzo(k)fluoranthene	1,500	33	170,000	117	379	228	60.16	25	530
Chrysene	15,000	38	696,000	37	284	206	72.54	25	530
Dibenz(a,h)anthracene	15	29	83,000	229	379	229	60.42	20	530
Indeno(1,2,3-cd)pyrene	150	29	160,000	180	371	211	56.87	25	17,000
Naphthalene	3,600	26	8,680,000	93	377	231	61.27	28	530
Pyrene	1,700,000	30	1,900,000	1	284	214	75.35	25	400
<b>Metals</b>									
Arsenic, Total <sup>b</sup>	13,000	23	44,500	37	282	279	98.94	10	NA
Lead, Total	400,000	10	2,100,000	4	260	259	99.62	NA	NA

**Table D-1 – Summary Statistics for Soils on the ComEd, LaSalle Chestnut, Division-Halsted and City Right-of-Way Parcels  
North Station Operable Unit  
Site-Specific Work Plan**

**NOTES:**

Screening levels (SL) are primarily based on USEPA Regional Screening Levels (RSL) and taken from the hierarchy of SLs developed for the Integrys Business Support LLC Manufactured Gas Plant sites in the multi-site program (Exponent, Risk-Assessment Framework Addendum, April 2011).

Bolded percentages indicate analytes were detected above SL in more than 5% of the samples.

<sup>a</sup> Soil samples screened against the residential soil screening values in the IBS Multi-Site Screening Level Hierarchy.

<sup>b</sup> Background concentration of arsenic in metropolitan counties of IL are 13.0 mg/kg (IL TACO-Table G). Total arsenic screened against background in this line.

[Max] - Maximum concentration

[Min] - Minimum concentration

MDL – Method detection limit

PAH - Polycyclic aromatic hydrocarbon

PCB - Polychlorinated biphenyl

SL - Screening level

SVOC - Semivolatile organic compound

ug/kg - Micrograms per kilogram

VOC - Volatile organic compound

**Table D-2 – Site-Specific COPCs for Soil, Groundwater, Sediment and Surface Water**  
**North Station Operable Unit**  
**Site-Specific Work Plan**

	Parcels			
	ComEd, LaSalle Chestnut, Division- Halsted, and City Right-of- Ways	Division and Halsted	Old Town Village West	North Branch Canal
COPCs				
Soil				
North Station Site-Specific COPC list <sup>a</sup>	X			
Multi-site RAF COPC list <sup>b</sup>		X	X	
PCBs		X	X	
TCL VOCs			X	
Groundwater				
North Station Site-Specific COPC list <sup>a</sup>	X	X	X	
Total antimony	X	X	X	
Total lead	X	X	X	
Available cyanide	X	X	X	
Phenol	X	X	X	
Styrene	X	X	X	
Sediment				
Multi-Site RAF COPC list <sup>b</sup>				X
Surface Water				
Multi-Site RAF COPC list <sup>b</sup>				X

**NOTES:**

X - Parameter selected as COPC

Shaded box indicates that matrix does not apply to the parcel.

<sup>a</sup> North Station Site-Specific COPC list includes: PVOCs from the multi-site RAF list, PAHs from the multi-site RAF list, 2-methylnaphthalene, dibenzofuran, total arsenic, total lead, and PCBs.

<sup>b</sup> The constituents on the Multi-Site RAF COPC list are presented in Appendix D-1.

COPC - Constituents of potential concern

PAH - Polycyclic aromatic hydrocarbon

PCB - Polychlorinated biphenyl

PVOC - Petroleum VOC

RAF - Risk Assessment Framework

TCL - Target Compound List

VOC - Volatile organic compound

**MULTI-SITE QAPP ADDENDUM  
UFP QAPP WORKSHEET #28**

QC Sample:	Frequency/Number	Method/SOP QC Acceptance Limits	Corrective Action	Person(s) Responsible for Corrective Action	Data Quality Indicator (DQI)	Measurement Performance Criteria
Field duplicate (aqueous)	1 in 10 investigative samples, unless otherwise specified	NA	Estimate (J) positive values	Project manager, with data validator and laboratory manager, as needed	Calculate RPD for compounds detected at concentrations $\geq 2x$ the quantitation limit (QL)	RPD<30%, per Multi-Site QAPP Table 6 and Region I, EPA-NE Data Validation Functional Guidelines for Evaluating Environmental Analyses, Revised (USEPA, December 1996)
			Use professional judgement to accept, qualify or reject positive detects for the compound. If data is rejected, location may be re-sampled.		Calculate RPD for compounds detected at concentrations $\geq QL$ and $< 2x QL$	
Field duplicate (non-aqueous)	1 in 20 investigative samples, unless otherwise specified		Estimate (J) positive values		Calculate RPD for compounds detected at concentrations $\geq 2x QL$	
			Use professional judgement to accept, qualify or reject positive detects for the compound. If data is rejected, location may be re-sampled.		Calculate RPD for compounds detected at concentrations $\geq QL$ and $< 2x QL$	

**QAPP Worksheet #28**

(UFP-QAPP Manual Section 3.4)

Complete a separate worksheet for each sampling technique, analytical method/SOP, matrix, analytical group, and concentration level. If method/SOP QC acceptance limits exceed the measurement performance criteria, the data obtained may be unusable for making project decisions.

**Title: Multi-Site QAPP****Addendum****Addendum Date: 3/12/12****Page \_1\_ of \_2\_****QC Samples Table**

Matrix	Aqueous and Non-Aqueous
Analytical Group	PCBs
Concentration Level	All
Sampling SOP	SAS-08-02/SAS-06-01
Analytical Method/SOP Reference	SW846 8081
Sampler's Name	TBD
Field Sampling Organization	TBD
Analytical Organization	TBD
No. of Sample Locations	TBD

QC Sample:	Frequency/Number	Method/SOP QC Acceptance Limits	Corrective Action	Person(s) Responsible for Corrective Action	Data Quality Indicator (DQI)	Measurement Performance Criteria
Field duplicate (aqueous)	1 in 10 investigative samples, unless otherwise specified	NA	Estimate (J) positive values	Project manager, with data validator and laboratory manager, as needed	Calculate RPD for compounds detected at concentrations $\geq 5x$ the quantitation limit (QL)	RPD < 30%, per Multi-Site QAPP Table 6 and Region I, EPA-NE Data Validation Functional Guidelines for Evaluating Environmental Analyses, Revised (USEPA, December 1996)
					Calculate absolute difference for compounds detected at concentrations $< 5x$ QL	
Field duplicate (non-aqueous)	1 in 20 investigative samples, unless otherwise specified				Calculate RPD for compounds detected at concentrations $\geq 5x$ QL	
					Calculate absolute difference for compounds detected at concentrations $< 5x$ QL	

**QAPP Worksheet #28**

(UFP-QAPP Manual Section 3.4)

Complete a separate worksheet for each sampling technique, analytical method/SOP, matrix, analytical group, and concentration level. If method/SOP QC acceptance limits exceed the measurement performance criteria, the data obtained may be unusable for making project decisions.

**Title: Multi-Site QAPP****Addendum****Addendum Date: 3/12/12****Page \_1\_ of \_2\_****QC Samples Table**

Matrix	Aqueous and Non-Aqueous
Analytical Group	Inorganics
Concentration Level	All
Sampling SOP	SAS-08-02/SAS-06-01
Analytical Method/ SOP Reference	SW846 6020/7471A/ 9012A/OIA 1677
Sampler's Name	TBD
Field Sampling Organization	TBD
Analytical Organization	TBD
No. of Sample Locations	TBD

QC Sample:	Frequency/Number	Method/SOP QC Acceptance Limits	Corrective Action	Person(s) Responsible for Corrective Action	Data Quality Indicator (DQI)	Measurement Performance Criteria
Field duplicate (aqueous)	1 in 10 investigative samples, unless otherwise specified	NA	Estimate (J) positive values	Project manager, with data validator and laboratory manager, as needed	Calculate RPD for compounds detected at concentrations $\geq 2x$ the quantitation limit (QL)	RPD < 30%, per Multi-Site QAPP Table 6 and Region I, EPA-NE Data Validation Functional Guidelines for Evaluating Environmental Analyses, Revised (USEPA, December 1996)
			Use professional judgement to accept, qualify or reject positive detects for the compound. If data is rejected, location may be re-sampled.		Calculate RPD for compounds detected at concentrations $\geq QL$ and $< 2x QL$	
Field duplicate (non-aqueous)	1 in 20 investigative samples, unless otherwise specified		Estimate (J) positive values		Calculate RPD for compounds detected at concentrations $\geq 2x QL$	
			Use professional judgement to accept, qualify or reject positive detects for the compound. If data is rejected, location may be re-sampled.		Calculate RPD for compounds detected at concentrations $\geq QL$ and $< 2x QL$	

**QAPP Worksheet #28**

(UFP-QAPP Manual Section 3.4)

Complete a separate worksheet for each sampling technique, analytical method/SOP, matrix, analytical group, and concentration level. If method/SOP QC acceptance limits exceed the measurement performance criteria, the data obtained may be unusable for making project decisions.

**Title: Multi-Site QAPP****Addendum****Addendum Date: 3/12/12****Page 1 of 2****QC Samples Table**

Matrix	Aqueous and Non-Aqueous
Analytical Group	VOCs/SVOCs
Concentration Level	All
Sampling SOP	SAS-08-02/SAS-06-01
Analytical Method/SOP Reference	SW846 8260/8270
Sampler's Name	TBD
Field Sampling Organization	TBD
Analytical Organization	TBD
No. of Sample Locations	TBD